

Jennifer Braster
Nevada Bar No. 9982
NAYLOR & BRASTER
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145
Telephone: (702) 420-7000
Facsimile: (702) 420-7001
jbraster@nblawnv.com

FISHER ZUCKER LLC
Jeffrey Zucker (admitted *pro hac vice*)
jzucker@fisherzucker.com
Frank A. Reino (admitted *pro hac vice*)
freino@fisherzucker.com
21 S. 21st Street
Philadelphia, PA 19103
Telephone: (215) 825-3100
Attorneys for It's Just Lunch International, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

IJL MIDWEST MILWAUKEE, LLC and
SARA DARLING

Plaintiffs,

v.

IT'S JUST LUNCH INTERNATIONAL,
LLC

Defendant/Counterclaimant/Third-Party
Plaintiff and Third-Party Counterclaim
Defendant,

v.

IJL MIDWEST MILWAUKEE, LLC, IJL
MIDWEST HOLDINGS, LLC, IJL
MIDWEST CHICAGO, LLC, IJL
MIDWEST CLEVELAND, LLC, IJL
MIDWEST DENVER, LLC, IJL DC
HOLDINGS, LLC and SARA DARLING.

Counterclaim Defendants/Counterclaims.

Case No. 2:19-CV-01006-APG-EJY

**STIPULATION AND ORDER
TO EXTEND DEADLINES FOR
EXPERT WITNESS DISCLOSURES**

1
2 IJL Midwest Milwaukee, LLC, Sara Darling, IJL Midwest Holdings, LLC's, IJL
3 Midwest Chicago LLC's, IJL Cleveland, LLC's, IJL Midwest Denver, LLC's and IJL DC
4 Holdings, LLC's and It's Just Lunch International, LLC, by and through their counsel of
5 record, hereby submit this stipulation to extend deadlines for expert witness disclosures.

6 In view of the forgoing, and in the interest of judicial economy, the undersigned
7 counsel, with the authority of their respective clients, stipulate and agree to the following
8 pursuant to Local Rule 26-3:
9

10 1. On June 30, 2020, the Court entered a Scheduling Order which, among
11 other things, set a deadline of January 21, 2021, for the exchange of expert witness
12 disclosures pursuant to Fed. R. Civ. P. 26(a)(2)(D). Docket No. 34 at ¶ 4.

13 2. The parties have exchanged written discovery demands.

14 3. Depositions, expert disclosures and supplemental written discovery
15 demands (if necessary) remain to be completed.
16

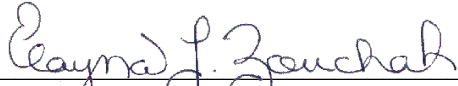
17 4. Good cause exists to extend the expert disclosures deadline because the
18 parties are continuing good faith settlement discussions. As a result, the parties have not
19 moved forward with retaining expert witnesses.

20 5. Accordingly, the parties stipulate and respectfully request the Court to
21 extend the expert disclosures to February 18, 2021, and rebuttal expert disclosures to
22 March 11, 2021.
23
24
25
26

6. The remaining deadlines in the Scheduling Order shall remain the same.

IT IS SO ORDERED.

Dated: December 21, 2020


Honorable Elayna J. Youchah
United States Magistrate Judge

HOWARD & HOWARD ATTORNEYS PLLC NAYLOR & BRASTER

By: /s/ Robert Hernquist
Robert Hernquist
Nevada Bar No. 10616
Wells Fargo Tower, Suite 1000
3800 Howard Hughes Parkway
Las Vegas, Nevada 89169-5980
Telephone: (702) 257-1483
Attorneys for Plaintiffs and
Third-Party Defendants
Dated: December 18, 2020

and
DADY & GARDNER, P.A.
John D. Holland (admitted *pro hac vice*)
5100 IDS Center
80 South 8th Street
Minneapolis, MN 55402
Telephone: (612) 359-3504

By: /s/ Jennifer Braster
Jennifer Braster
Nevada Bar No. 9982
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145
Telephone: (702) 420-7000
Attorneys for Defendant and
Third-Party Plaintiff,
It's Just Lunch International, LLC
Dated: December 18, 2020

and
FISHER ZUCKER LLC
Jeffrey Zucker (admitted *pro hac vice*)
Frank A. Reino (admitted *pro hac vice*)
21 S. 21st Street
Philadelphia, PA 19103
Telephone: (215) 825-3100